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6	Attorneys for Plaintiff		
7	United States of America		
8			
9	IN THE UNITED STATES DISTRICT COURT		
10	FOR THE EASTERN DISTRICT OF CALIFORNIA		
11			
12	UNITED STATES OF AMERICA	Case No. 1:24-cr-00231-NODJ-BAM	
13			
14	Plaintiff,	STIPULATION TO CONTINUE STATUS CONFERENCE; AND ORDER	
15	v.		
16	KRISTOPHER THOMAS,		
17	CHARMANE DOZIER, KETTISHA THOMPSON-DOZIER, and		
18	SHARON VANCE,		
19	Defendants.		
20			
21	IT IS HEREBY STIPULATED between	the parties that the status conference scheduled	
22	for August 27, 2025, may be continued until October 8, 2025, at 1:00 p.m., before the Honorable		
23	Barbara A. McAuliffe. The government has produced discovery to defense, which consists of		
$\begin{bmatrix} 23 \\ 24 \end{bmatrix}$	millions of pages and includes detailed tax and other financial records. The parties have also		
/ 💶			

continued to meet and confer regarding potential plea offers to resolve the case and are hopeful

that a resolution will soon be reached. Finally, one of the defendant's attorneys is expected to be

off work for parental leave for the month of September 2025. All the defendants' attorneys have

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further investigation to perform.

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1	Accordingly, the parties are requesting	one last continuance of the status conference	
2	before setting a trial date to see if they can resolve the case. The parties agree that time under the		
3	Speedy Trial Act shall be excluded through October 8, 2025, in the interests of justice, including		
4	but not limited to, the need for effective defense preparation and defense investigation pursuant		
5	to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv). The parties also agree that the ends		
6	of justice served by taking this action outweigh the best interests of the public and of the		
7	defendant to a speedy trial.		
8			
9			
10	Dated: August 19, 2025	/s/ Peter Jones Peter Jones	
11		Counsel for Kristopher Thomas	
12	Dated: August 19, 2025	_/s/ Christina Corcoran	
13	Dated. August 17, 2025	Christina Corcoran Counsel for Charmane Dozier	
14		Counsel for Charmane Dozler	
15	Dated: August 19, 2025	<u>/s/ Serita Rios</u> Serita Rios	
16		Counsel for Kettisha Thompson-Dozier	
17			
18	Dated: August 19, 2025	/s/ Victor Nasser	
19		Victor Nasser Counsel for Sharon Vance	
20	D 4 1 A 410 2025		
21	Dated: August 19, 2025	/s/ Joseph Barton Joseph Barton	
22		Assistant United States Attorney	
23			
24			
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26			
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